TECHNICAL REVIEW DOCUMENT
For
RENEWAL OF OPERATING PERMIT 95OPAD047

Colorado Interstate Gas Company – Watkins Compressor Station
Adams County
Source ID 0010036

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Revised November 2002 and January 2003

I. Purpose

This document will establish the basis for decisions made regarding the applicable requirements, emission factors, monitoring plan and compliance status of emission units covered by the renewed operating permit proposed for this site. The original Operating Permit was issued December 1, 1997, and expires on December 1, 2002. This document is designed for reference during the review of the proposed permit by the EPA, the public, and other interested parties. The conclusions made in this report are based on information provided in the renewal application submitted November 7, 2001, comments on the draft permit and the technical review document received January 13, 2003, previous inspection reports and various e-mail correspondence, as well as telephone conversations with the applicant. Please note that copies of the Technical Review Document for the original permit and any Technical Review Documents associated with subsequent modifications of the original Operating Permit may be found in the Division files as well as on the Division website at http://www.cdphe.state.co.us/ap/Titlev.html.

On April 16, 1998, the Colorado Air Quality Control Commission directed the Division to implement new procedures regarding the use of short term emission and production/throughput limits on Construction permits. These procedures are being directly implemented in all operating permits that had not started their Public Comment period as of April 16, 1998. All short term emission and production/throughput limits that appeared in the construction permits associated with this facility that are not required by a specific State or Federal standard or by the above referenced Division procedures have been deleted and all annual emission and production/throughput limits converted to a rolling 12 month total. Note that, if applicable, appropriate modeling to demonstrate compliance with the National Ambient Air Quality Standards was conducted as part of the Construction Permit processing procedures. If required by this permit, portable monitoring results and/or EPA reference test method results will be multiplied by 8760 hours for comparison to annual emission limits unless there is a specific condition in the permit restricting hours of operation.

Any revisions made to the underlying construction permits associated with this facility made in conjunction with the processing of this operating permit application have been reviewed in accordance with the requirements of Regulation No. 3, Part B, Construction Permits, and have been found to meet all applicable substantive and procedural requirements. This operating permit incorporates and shall be considered to be a combined construction/operating permit for any such revision, and the permittee shall be allowed to operate under the revised conditions upon issuance of this operating permit without applying for a revision to this permit or for an additional or revised construction permit.

II. Description of Source

The facility is a natural gas compression facility as defined under Standard Industrial Classification 4922. Natural gas enters the Watkins facility at a pressure between 400 and 700 psig. Some of the gas is blended with air to achieve a customer specified Btu value prior to delivery to customers. The remaining natural gas is compressed up to a pressure of 920 psig. Eleven (11) internal combustion engines are used at this facility to drive compressors. In addition, VOC emissions from equipment leaks are above APEN de minimis and have been included in Section II of the operating permit as significant emission unit. In addition, the gasoline storage tank and solvent degreaser listed in the insignificant activities list (Appendix A) of the current permit have been moved and included in Section II since the tank and degreaser are subject to requirements in Reg 7 and cannot be considered insignificant activities in accordance with the "catch-all" provisions in Reg 3, Part C, Section II.E (2nd paragraph). Based on the information available to the Division and provided by the applicant, it appears that no modifications to these emission units has occurred since the original issuance of the operating permit.

During internal review of the draft operating permit, the inspector identified several insignificant activities that were not identified in Appendix A of the current operating permit. These insignificant activities have been included in Appendix A. It should be noted that revisions to the insignificant activity definition list in Reg 3, Part C, Section II.E will become effective as of December 30, 2002. Some of the insignificant activities identified by the inspector (e.g. condensate storage tanks and condensate truck loading equipment) may no longer be considered insignificant activities under the Reg 3 revisions. In their comments on the draft permit submitted January 13, 2003 the source provided information which indicated that the condensate tanks and the condensate truck loading equipment could still be considered insignificant activities.

This facility is classified as a natural gas transmission facility but is not subject to the provisions of 40 CFR Part 63 Subpart HHH, since there is no glycol dehydrator at this facility.

Under the federal Clean Air Act (the Act), EPA is charged with promulgating maximum achievable control technology (MACT) standards for major sources of hazardous air pollutants (HAPs) in various source categories by certain dates. Section 112(j) of the Act requires that permitting authorities develop a case-by-case MACT for any major sources of HAPs in source categories for which EPA failed to promulgate a MACT standard by May 15, 2002. These provisions are commonly referred to as the "MACT hammer".

Owner or operators that could reasonably determine that they are a major source of HAPs which includes one or more stationary sources included in the source category or subcategory for which the EPA failed to promulgate a MACT standard by the section 112(j) deadline were required to submit a Part 1 application to revise this operating permit by May 15, 2002. Based on the information provided by this source, the Watkins facility is a major source of HAPs (i.e. facility-wide potential to emit of greater than 10 tons per year of any single HAP or greater than 25 tons per year of all HAPs combined) for a covered source category (reciprocating internal combustion engines and industrial, commercial and institutional boilers and process heaters) and did submit a Part 1 application to the Division prior to May 15, 2002. As of the date of issuance of this permit, a Part 2 application to revise this operating permit is due by April 28, 2004. That date, however, may be revised. Affected facilities that fail to submit a timely and complete application will be considered in violation and such violations may be subject to enforcement action.

Although the current operating permit indicates that several of the engines are controlled (i.e. clean burn), a clean burn engine design or operating mode is not considered a control device as defined in 40 CFR Part 64 §64.1, as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV, since passive control measures that act to prevent the pollutants from forming, such as the use of combustion or other process design features or characteristics are not considered control devices. In addition, although the gasoline storage tank is identified as being controlled (submerged fill pipe), potential uncontrolled emissions are unlikely to exceed the major source levels. Therefore, since none of the significant emission units at this facility are equipped with control devices and have potential uncontrolled emissions over major source levels, the Compliance Assurance Monitoring (CAM) requirements do not apply to any emission units at this facility.

The facility is located in Adams County about 3 miles east of Aurora. The Denver metro area is classified as attainment/maintenance for particulate matter less than 10 microns (PM_{10}), ozone and carbon monoxide. Under that classification, all SIP-approved requirements for PM_{10}, VOC and CO will continue to apply in order to prevent backsliding under the provisions of Section 110(l) of the Federal Clean Air Act. There are no federal Class I designated areas within 100 km of this facility and no affected states within 50 miles of this facility.

The summary of emissions that was presented in the Technical Review Document (TRD) for the original permit issuance has been modified to more appropriately identify the potential to emit (PTE) since AP-42 emission factors for the permit exempt engines have changed. Emissions (in tons/yr) at the facility are as follows:

Pollutant	Potential to Emit	Actual Emissions
NO_X	1,026	411
CO	678.3	153
VOC	336	174
HAPs (formaldehyde)	28	14

The PTE for the permit exempt engines is based on emission factors, maximum horsepower and 8760 hrs/yr of operation. The PTE for the permitted engines and the fugitive VOC emissions is based on permit limits. The PTE for formaldehyde is based on emission factors and design rate for the engines. Actual emissions for the engines are based on APENs submitted February 18 and May 22, 2000 (based on 1999 data).

III. Discussion of Modifications Made

Source Requested Modifications

The source's requested modifications identified in the renewal application were addressed as follows:

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CIG requested that a primary and secondary Responsible Official be identified in the permit for more flexibility in completing the required certifications. The Division will grant this request. However, CIG should be aware that whichever Responsible Official signs the documents, that person becomes the responsible party regarding any non-compliance situation related to the Operating Permit and is subject to both civil and criminal penalties that may be associated with non-compliance situations. In addition, the permit contact was changed as requested in the renewal application.

Other Modifications

In addition to the modifications requested by the source, the Division has included changes to make the permit more consistent with recently issued permits, include comments made by EPA on other Operating Permits, as well as correct errors or omissions identified during inspections and/or discrepancies identified during review of this renewal.

The Division has made the following revisions, based on recent internal permit processing decisions and EPA comments, to the Watkins Renewal Operating Permit with the source's requested modifications. These changes are as follows:

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- Clarified dates for monitoring and compliance periods, i.e. changed "December - May" to "December 1 – May 31".

  Monitoring and compliance periods and report and certification due dates are shown as examples. The appropriate monitoring and compliance periods and report and certification due dates will be filled in after permit issuance and will be based on permit issuance date. Note that the source may request to keep the same monitoring and compliance periods and report and certification due dates as were provided in the original permit. However, it should be noted that with this option, depending on the permit issuance date, the first monitoring period and compliance period may be short (i.e. less than 6 months and less than 1 year).

- The citation (above "issued to" and "plant site location") on the page following the cover page provides the incorrect title for the state act. The title will be changed from "Colorado Air Quality Control Act" to "Colorado Air Pollution Prevention and Control Act". In addition, the dates were removed from the citation.

- Added language specifying that the semi-annual reports and compliance certifications are due in the Division's office and that postmarks cannot be used for purposes of determining the timely receipt of such reports/certifications.

Section I – General Activities and Summary

- Conditions 13 and 17 in Condition 1.4 were renumbered to 14 and 18 and Condition 21 in Condition 1.5 was renumbered to 22. The renumbering changes were necessary due to the addition of the Common Provisions requirements in the General Conditions of the permit.

- Removed the reference to the EPA PSD permit in Condition 1.3. The EPA PSD permit was issued for engines that were never installed at the Watkins facility and as a result this EPA permit is cancelled since construction never commenced within eighteen months of issuance.

- Construction Permits C-12,683-1 and –2 were included in Condition 1.3, which lists the construction permits and associated applicable requirements that were incorporated into the operating permit. However these permits were issued to a boiler and a regenerator heater that the

original technical review document identified as insignificant activities and the construction permits were subsequently canceled.

- Added Construction Permit P-10,675 to Condition 1.3. This permit was issued for the two Worthington engines. It should be noted that the only applicable requirement that this permit contained was an hourly particulate matter limit which is not included in the operating permit. In the technical review document to support the original operating permit, the Division indicated that the particulate matter limit was not included in original permit because natural gas-fired engines are not a significant source of particulate matter limits.

- Changed the language in Condition 3.1 to address PSD rather than non-attainment area NSR, since the Denver metro area is now classified as attainment/maintenance for PM_{10}, VOC and CO.

- Based on comments made by EPA on another operating permit, the phrase "Based on the information provided by the applicant" was added to the beginning of Condition 4.1 (112(r)).

- Corrected the Table in Condition 5 to address the different groups of engines that have been permitted and installed at the facility. The serial number was corrected for one of the engines in the group E003 – E006 (the group previously identified as E003 – E007).

- Added the gasoline storage tank and cold cleaner solvent degreaser to the Table in Condition 5.

- Added a "new" Section 5 for compliance assurance monitoring (CAM), note that no emission units are subject to CAM.

- Added a "new" Section 6 for case-by-case MACT (i.e. 112(j)).

<u>Section II.1 – Permit Exempt Internal Combustion Engines</u>

- The emission factors identified in the current operating permit are AP-42 emission factors. Since the AP-42 emission factors for internal combustion engines were revised in July 2000, the emission factors identified in the operating permit will be updated to the current AP-42 emission factors.

  The current permit requires the source to use AP-42 emission factors (Section 3.2) to calculate annual emissions for units E001 and E002. The AP-42 emission factors in the current permit were from Section 3.2, dated July 1996. This version included emission factors in units of lbs/hp-hr or lbs/mmBtu. The current permit includes the AP-42 emission factors in g/hp-hr. Section 3.2 of AP-42 was updated in July 2000 and as previously

mentioned the permit will be revised to include the updated AP-42 emission factors. The updated AP-42 emission factors are in units of lbs/mmBtu only. For grandfathered or permit exempt engines, the Division allowed the source to use emission factors in units of either g/hp-hr or lbs/mmBtu. Since the current permit identified emission factors in units of g/hp-hr, the Division will include the revised AP-42 emission factors in the permit in units of g/hp-hr.

AP-42, Section 3.2 indicates that the lbs/mmBtu emission factor can be converted to g/hp-hr by dividing by the maximum hp and multiplying by the design heat input of the engine. After further review, the Division considers that this method would not be appropriate. Since the AP-42 emission factors are based on test results from specific engines, data from the test results should be converted to the emission factors in the desired units based on the specifics of the engines tested.

The test data on which the AP-42 emission factors is based on is available on EPA's web page at http://www.epa.gov/ttn/chief/ap42/ch03/related/c03s02.html. The database of test data was downloaded and reviewed. Test results were available in units of lbs/hp-hr, as well as lbs/mmBtu. The average emission factor from the appropriate population (4-cycle rich burn engines without controls) of test results was included in the operating permit. The emission factors are as follows:

Pollutant	Emission Factor[1] (lbs/hp-hr)	Population
NO_X[2]	2.52×10^{-2} [11.4]	4-cycle rich burn engines without controls, < 90% load
CO[2]	4.16×10^{-2} [18.9]	4-cycle rich burn engines without controls, < 90% load
VOC	2.49×10^{-4} [0.11]	4-cycle rich burn engines without controls – all loads

[1]Values are in brackets are in units of g/hp-hr
[2]Note that for the cases with loads less than 90%, only those results with an identified horsepower for the engine were used in the average. A review of the lbs/mmBtu emission factors indicates that averaging only those values with identified horsepower appears to be consistent with the published emission factors.

- Reworded Condition 1.1 and included an equation to calculate emissions. In addition, under "monitoring method" in the Table "calculation" was replaced with "recordkeeping and calculation".

- The language regarding the monitoring for the 20% opacity requirement (Condition 1.3) was revised. In addition, the standard was rewritten to more closely resemble the language in Regulation No. 1.

- Under “monitoring interval” in Table for Condition 1.3, replaced “annually” with “whenever natural gas is used as fuel”.

- Under “limitations” in Table for Condition 1.3, replaced “less than or equal to 20%” with “not to exceed 20%”. This is more consistent with the language in the regulation.

  Note that no condition is included for the 30% opacity standard, which is applicable during certain operating activities. The specific activities under which the 30% opacity standard applies are: building a new fire, cleaning of fire boxes, soot blowing, startup, any process modification, or adjustment or occasional cleaning of control equipment. Based on engineering judgment the Division considers that building a new fire, cleaning of fire boxes and soot-blowing does not apply to the operation of internal combustion engines. In addition, these engines do not have control devices, so adjustment or occasional cleaning of control devices do no apply to these engines. Process modifications and startup may apply to engines, however, based on engineering judgment, the Division believes that such activities would be unlikely to occur for longer than six minutes. Therefore, the 30% opacity requirement has not been included in the operating permit.

Section II.2 – Permitted Engines

- Removed short term emission and fuel consumption limits to be consistent with the Division’s short term emission limit policy that was implemented after issuance of the original operating permit for this source.

- Changed the requirement in Condition 2.1 to calculate emissions “by the tenth day of the month” to “by the end of the subsequent month” to be more consistent with other operating permits.

- Added “as modified under the provisions of Section I, Condition 1.3” after the citation in Condition 2.1 to indicate that the underlying limits in the construction permits had been changed (i.e. short term emission limits were removed).

- Changed the requirement in Condition 2.2 to record fuel consumption “on the first day of the month” to “on the first working day of the month” to be more consistent with other operating permits.

- Added a condition (new condition 2.3) to record hours of operation to use in allocating fuel consumption.

- Revised the language in Condition 2.3 regarding the gas analysis. The changes specify that ASTM methods be used or the in-line gas chromatograph.

- Under “monitoring method” in the Table for Condition 2.3, replaced “EPA Methods” with “ASTM Methods or In-Line Gas Chromatograph”.

- Included new quarterly portable monitoring language. This language requires that the emission factor be verified and the frequency of the testing remains at quarterly.

- The Division removed the requirement to measure and record the exhaust gas oxygen concentration (Condition 2.5) as the Division has determined that recording this information is not necessary.

- The language regarding the monitoring for the 20% opacity requirement (Condition 2.6) was changed to EPA approved language. The standard was rewritten to more closely resemble the language in Regulation No. 1.

- Under “monitoring interval” in Table for Condition 2.6, replaced “semi-annually” with “whenever natural gas is used as fuel”.

- Under “limitations” in Table for Condition 2.6, replaced “less than or equal to 20%” with “not to exceed 20%”. This is more consistent with the language in the regulation.

  Note that no condition is included for the 30% opacity standard, which is applicable during certain operating activities. The specific activities under which the 30% opacity standard applies are: building a new fire, cleaning of fire boxes, soot blowing, startup, any process modification, or adjustment or occasional cleaning of control equipment. Based on engineering judgment the Division considers that building a new fire, cleaning of fire boxes and soot-blowing does not apply to the operation of internal combustion engines. In addition, these engines do not have control devices, so adjustment or occasional cleaning of control devices do no apply to these engines. Process modifications and startup may apply to engines, however, based on engineering judgment, the Division believes that such activities would be unlikely to occur for longer than six minutes. Therefore, the 30% opacity requirement has not been included in the operating permit.

- Revised Condition 2.7 and added the phrase “and good engineering practices” after “manufacturer’s recommendations”.

Correction to Technical Review Document for Original Operating Permit

The following discussion is intended to correct some errors in the technical review document for the original operating permit. The technical review document for the original Title V Operating Permit indicated that the current construction permits for these units were all issued on July 1, 1982 and states that those permits establish limitations on the hourly and annual emissions for

NO_X, CO and VOC. However, only Construction Permits C11,629-1 thru –3 and C11,630-1 thru 4 were revised on July 1, 1982 and have short term and annual NO_X, CO and VOC emission limits. Construction Permits C11,629-4 and C11,630-5 were not revised in 1982 and only contained short term NO_X limits and the 20% opacity limit. The issuance dates of these permits were May 10, 1979 for C11,629-4 (final approval) and February 7, 1979 for C11,630-5 (final approval permit). As discussed in the attachment (memo dated June 6, 1996) to the original technical review document, CIG had modified 7 of the 9 engines to operate in "clean burn" mode and as such only seven of the permits for these engines were modified. The Division included the same short term and annual emission limits for all engines in the original operating permit as there was every indication that this was what CIG wanted. The original Title V operating permit application indicated that the short term and annual NO_X, CO and VOC limits were applicable requirements for all of the Cooper engines. In addition, as part of the original Title V permitting process, the source submitted APENs for all the Cooper engines indicating that requested emissions for all engines was consistent with the annual limitations in the construction permits issued on July 1, 1982.

Section II.3 – Fugitive VOC Emissions from Equipment Leaks

- Added "as modified under the provisions of Section I, Condition 1.3" after the citation in Condition 3.1 to indicate that the underlying limits in the construction permit had been changed (i.e. short term emission limits were removed).

- "EPA's Protocol for Equipment Leak Emission Estimates", was updated in 1995. These revised emission factors will be included in the permit. Note that these emission factors predict lower emissions.

- Although it is implied in the permit, the permit was modified to clarify that the emission calculations in Condition 3.1 shall be conducted on an annual basis.

- Revised Condition 3.1 to specify that a component count shall be conducted within one year of renewal permit issuance, rather than original permit issuance. The language specifying that the component count shall be conducted every five years thereafter shall remain in the permit.

- Added a Condition for performing the gas analysis. The current permit says to use the gas analysis required by Condition 2.3, which is semi-annual testing to determine the heat content of the gas and is not appropriate for purposes of calculating VOC emissions.

Section II.4 – Gasoline Storage Tank

An 8,400 gallon gasoline storage tank was included in the insignificant activities list in Appendix A of the permit. In their comments on the draft permit, submitted on January 13, 2003, the source submitted calculations demonstrating that the emissions from this tank are below APEN de minimis (2 tpy). In addition, in May 2003, the tank was retrofitted for Stage I Vapor recovery and is therefore exempt from APEN reporting under Colorado Regulation No. 3, Part A, Section II.D.1.ccc. Since the tank is not subject to APEN reporting requirements, the tank is not subject to the construction permit requirements in Regulation No. 3, Part B. However, the tank is subject to requirements in Colorado Regulation No. 7, Section VI.B.3 and under the "catch-all" provisions in Regulation No. 3, Part C, Section II.E (2nd paragraph) the tank cannot be considered an insignificant activity because it is subject to specific requirements in Regulation No. 7. Since the tank cannot be considered an insignificant activity, the tank will be included in the operating permit as a significant emission unit.

The applicable requirements from Regulation No. 7 for this unit are as follows:

- General requirements for maintenance and operation of storage tanks (Reg 7, Section III.A).

- Disposal of VOC compounds - general (Reg 7, Section V.A).

  Note the above two requirements are included in the general conditions (Section IV) and therefore will not be specifically identified and addressed in Section II of the permit.

- Disposal of gasoline (Reg 7, Section V.B).

- Requirements for storage of petroleum liquids in tanks less than 40,000 gal (Reg 7, Section VI.B.3).

  - The owner of operator of storage tanks at a gasoline dispensing facility, which receives and stores petroleum liquid, shall not allow the transfer of petroleum liquid from any delivery vessel into any tank unless the tank is equipped with a submerged fill pipe and the vapors displaced from the storage tank during filling are processed by a vapor control system (Reg 7, Section VI.B.3.b)
  - Tanks equipped with a submerged fill pipe shall meet the specifications of Appendix A (Reg 7, Section VI.B.3.c)
  - The vapor control system shall include a vapor-tight line from the storage tank to delivery vessel (i.e. an approved control system) (Reg 7, Section VI.B.3.d.(i)).

- The owner or operator shall ensure that operating procedures are used so that gasoline cannot be transferred into the tank unless the vapor control system is in use (Reg 7, Section VI.B.3.e).

Note that as previously discussed, the vapor control system is essentially the tanker truck (vapor balance system), the following requirements in Reg 7, Section VI.B.3 will not be included in the operating permit as they apply to the tanker truck/vapor control system.

- approved vapor balance system (Reg 7, Section VI.B.3.b.(iii))
- vapor balance system specifications (Reg 7, Section VI.B.3.f)
- vapor balance system and vapor control system shall meet the requirements of Section XV (Reg 7, Section VI.B.3.g)
- control device testing and recordkeeping requirements (Reg 7, Section VI.B.3.h & I)

Note that by having the tank filled by a certified tanker truck (i.e. a tanker truck meeting the requirements in Reg 7, Section VI.D), the storage tank is being operated in compliance with the above requirements.

In addition, the requirements in Reg 7, Section XV, "Control of VOC Leaks from Vapor Collection Systems and Vapor Control Systems Located at Gasoline Terminals, Gasoline Bulk Plants, and Gasoline Dispensing Facilities" will not be included in the permit as the requirements apply to the operator of a vapor collection or vapor control system, which is the tanker truck. These requirements do not apply to the transfer of gasoline from the tank to a motor vehicle fuel tank, which are operations CIG performs.

Emission Factors

Since the tank is not subject to the APEN reporting requirements (VOC emissions < 2 tpy), the permit will not require that emissions be calculated for this tank.

Monitoring Requirements

The annual certification required by the operating permit will serve as the compliance indicator that this tank is only filled by a certified tanker truck and that the remaining Regulation No. 7 requirements are being met (i.e. VOC disposal, submerged pipe specifications, etc.).

Section II.5 Cold Cleaner Solvent Degreaser

A solvent degreaser was included in the insignificant activities list in Appendix A of the permit. In their comments on the draft permit, submitted on January 13, 2003, the source Indicated that the solvent cleaner at the facility meets the

definition of a cold cleaner in Regulation No. 7, Section X. Although it was not addressed in the source's comments on the draft permit, the Division assumes that VOC emissions from the cold cleaner solvent degreaser are below 2 tpy and is therefore exempt from APEN reporting and construction permit requirements. However, the solvent degreaser is subject to requirements in Colorado Regulation No. 7, Section X and under the "catch-all" provisions in Regulation No. 3, Part C, Section II.E (2nd paragraph) the degreaser cannot be considered an insignificant activity because it is subject to specific requirements in Regulation No. 7. Since the degreaser cannot be considered an insignificant activity, the degreaser will be included in the operating permit as a significant emission unit.

The applicable requirements from Regulation No. 7 for this unit are as follows:

- Transfer and storage of waste solvent and used solvent (Reg 7, Sections X.A.3 and 4)

- Solvent Cold Cleaner Requirements (Reg 7, Section X.B)

    - Control Equipment - covers, drainage, labeling and spray apparatus requirements (Reg 7, Section X.B.1)
    - Operating Requirements (Reg 7, Section X.B.2)

Section III – Permit Shield

- The language in the justification for the permit shield for the PSD requirements was revised. Based on comments made by EPA on another permit, EPA indicated that the Division could not grant the shield for PSD review requirements, unless the source was an existing source prior to August 7, 1977 and no additional equipment had been added to the facility after the August 7, 1977 applicability date.

- The citation in the permit shield was corrected. The reference to Part A, Section I.B.43 was changed to Part A, Section I.B.44 and the reference to Part C, Section XIII was changed to Part C, Section XIII.B.

- The title for Section 1 was changed from "Specific Conditions" to "Specific Non-Applicable Requirements" and a new section 3 was added for subsumed (streamlined) conditions. Note that there are no streamlined conditions.

- Based on comments made by EPA on another permit, the following phrase was added to the beginning of the introductory sentence in Section 1 "Based upon the information available to the Division and supplied by the applicant".

- Based on comments made by EPA on another permit, the following statement was added after the introductory sentence in Section 1 “This shield does not protect the source from any violations that occurred prior to or at the time of permit issuance”.

- In addition, the following phrase “In addition, this shield does not protect the source from any violations that occur as a result of any modification or reconstruction on which construction commenced prior to permit issuance” was added to the end of the introductory paragraph in Section 1.

- Based on comments made by EPA on another permit, the phrases regarding reconstruction or modification under the shield for NSPS K, Ka, Kb and KKK were removed. It is EPA’s opinion that the Division may not have all of the information available to determine whether a reconstruction or modification has occurred and as a result the justification should not address modifications or reconstructions.

Section IV - General Conditions

- Added an “and” between the Reg 3 and C.R.S. citations in General Condition 3 (compliance requirements).

- Added language from the Common Provisions (new condition 3). With this change the reference to “21.d” in Condition 20 (prompt deviation reporting) will be changed to “22.d”, since the general conditions are renumbered with the addition of the Common Provisions.

- The citation in General Condition 7 (fees) was changed to cite the Colorado Revised Statue. In addition, any specific identification of a fee (i.e. $100 APEN fee) or citation of Reg 3 was removed and replaced with the language “…in accordance with the provisions of C.R.S. [appropriate citation].”

- The citation in General Condition 13 (odor) was corrected. In addition, the phrase “Part A” was added to the citation for Condition 13 (odor). Colorado Regulation No. 2 was revised and a Part B was added to address swine operations. Colorado Regulation No. 2, Part B should not be included as a general condition in the operating permit.

- The citation in General Condition 16 (open burning) was revised. The open burning requirements are no longer in Reg 1 but are in new Reg 9. In addition, changed the reference in the text from “Reg 1” to “Reg 9”.

- The citation for Condition 25 (significant permit modifications) was corrected.

- The reference in Condition 28 (volatile organic compounds) to Regulation No. 7, Section III.C.3 was corrected to Regulation No. 7, Section VIII.C.3.

- Added the requirements in Colorado Regulation No. 7, Section V.B (disposal of volatile organic compounds) to General Condition 28.

Appendices

- First Page of Appendices – The phrase "except as otherwise provided in the permit" was added after the word "enforceable" in the disclaimer at the request of EPA.

Appendix A – Insignificant Activities

- There are four boilers and heaters that are identified in the insignificant activity list, which were previously addressed in construction permits. However, because the units could be considered insignificant activities, the construction permits were canceled. The associated permit numbers were added to the insignificant activity list.

- Clarified that the Smalling heater qualifies as an insignificant activity because criteria pollutant emissions are below 2 tpy if the unit is operated < 5,100 hrs/yr.

- Removed the gasoline storage tank and solvent degreaser. As mentioned previously in this document these units can no longer be considered insignificant activities.

- The inspection report, dated November 19, 2001, indicates that two "air dehydration" units were added to the facility. As discussed in the inspection report, these units can be considered insignificant activities, since the units don't vent to the atmosphere. These units will be added to the insignificant activity list.

- During internal review of the draft operating permit, the inspector, identified the following equipment that is located at the site that may be considered insignificant activities: 2 diesel storage tanks, 2 condensate tanks and a truck load-out for condensate. In their comments on the draft permit submitted on January 13, 2003, the source indicated that the diesel storage tanks were 2,000 gal each, that the 2 condensate tanks were pressurized and that the condensate truck loading equipment has actual uncontrolled VOC emissions below 2 tpy. Therefore, the diesel tanks, condensate tanks and truck loading equipment can still be considered insignificant activities.

Appendix B and C

- Appendix B and C were replaced with revised Appendices.
- Corrected the Table in the appendices to address the different groups of engines that have been permitted and installed at the facility. The numbering for the engines was the opposite in Appendix B as was shown in the table in Section I.5 (i.e. E003-E007 in Section II.2 was numbered as E008 – E0011 in Appendix B). The serial number was corrected for one of the engines in the group E003 – E006 (those engines previously identified in Appendix B as E008 – E011).
- Added the gasoline storage tank and solvent degreaser to the Tables.

Appendix D

- The EPA addresses in Appendix D were corrected.